

Attachment

Impact to Businesses and/or Employees

Possible impacts to businesses and/or employees have been identified and are described below.

Growers/operators impacted by 100-foot buffer zone

An unknown number of agricultural growers/operators will be impacted by the 100-foot no-spray buffer zone requirement. Because the proposed regulation restricts the application of dormant insecticides from areas "...within 100 feet of any sensitive aquatic site," production could potentially be lost when trees/crops fall within the 100-foot buffer and become untreatable.

Growers/operators cost of deferring dormant spray applications

Because dormant season applications may be restricted by this regulation, it is possible that some growers/operators will either be unable to make a dormant insecticide application when they deem they can achieve optimum pest control, or may have to forego dormant insecticide applications entirely in a given season. (Because a dormant season application generally occurs only once during the dormant season, it seems unlikely that another window of opportunity for applications wouldn't occur.) In either of these cases a grower/operator may have to resort to in-season (growing season) applications to control pests. Such in-season applications may or may not be more expensive or effective in terms of pest control; more applications may be required to control pests in-season than would be the case if the dormant application(s) could have been made.

Because of the possible variables involved in pest-dependent dormant season/growing season pest control, it is very difficult to determine the impact of delaying or foregoing dormant insecticide applications.

Impact on pesticide industry

It is difficult to assess the impact shifts in use patterns may have on pesticide sales; missed dormant season applications may spell more in-season pesticide sales, but may also entail shifts in pesticide sales from companies selling dormant season products. However, as stated above, because dormant insecticides are generally applied only once during the dormant season, it is unlikely a grower/operator will not have an opportunity to apply during the dormant season.